

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 15-40069-JPG
vs.)	
)	
TODD A. TOLER,)	
)	
Defendant.)	

STIPULATION OF FACTS

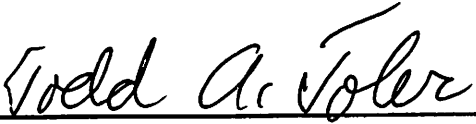
Comes now the United States of America, by and through its attorneys, James L. Porter, Acting United States Attorney for the Southern District of Illinois, and Amanda A. Robertson, Assistant United States Attorney, together with the defendant, TODD A. TOLER, and his counsel of record, Mark C. Hunter, and herewith enter into the following stipulation of facts consistent with Section 1B1.3 of the United States Sentencing Guidelines pertaining to the defendant's relevant conduct. This stipulation of facts is intended only to provide the Court with a sufficient foundation to accept the defendant's guilty plea and is not an exhaustive account of the defendant's involvement in or knowledge regarding this or other criminal activity.


During the time of the charged conspiracy, defendant was involved with the others in the manufacture, distribution, and use of methamphetamine in the Southern District of Illinois. Those persons that defendant was involved with included, but was not limited to: Nathan Stokes, Johnny Eubanks, Jeff Pratis, Kenny Pearl, Greg Earnhart, Jason Brown, Shannon Cunningham, Joda Cunningham, Sarah Pearl, Steven Moore, and Jake Turner. Defendant traded pseudoephedrine for methamphetamine with Pratis, Kenny Pearl, Brown, Earnhart, and others. Defendant also obtained pseudoephedrine pills from Stokes, the Cunninghams, Sarah Pearl, Eubanks, Turner, and others to use to manufacture methamphetamine. Defendant would provide

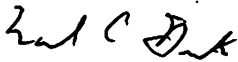
persons with ½ gram of methamphetamine in return for each box of pseudoephedrine pills that he received. Generally, the methamphetamine would be divided amongst persons that contributed to a cook. Defendant was present when Pratis manufactured methamphetamine at Kenny Pearl's residence.

Defendant agrees that his relevant conduct includes at least 200 grams of pseudoephedrine, which was possessed for the purpose of manufacturing methamphetamine.

Respectfully submitted,


TODD A. TOLER
Defendant


AMANDA A. ROBERTSON
Assistant United States Attorney


MARK C. HUNTER
Attorney for Defendant

Date: 4/20/2016

Date: April 3, 2016